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SAMSUNG ELECTRONICS AMERICA, INC.

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Attorneys for Plaintiff  
VICTORIA TULIPANI

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

VICTORIA TULIPANI, On Behalf Of  
Herself And All Others Similarly Situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,  
INC. and DOES ONE through ONE  
HUNDRED, inclusive,

Defendants.

Case No. 17-CV-513-LB

**STIPULATION AND ~~PROPOSED~~**  
**ORDER OF DISMISSAL**

Complaint Filed: February 1, 2017

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**I. STIPULATION**

After engaging in discovery and negotiation, Plaintiff Victoria Tulipani (hereinafter, “Plaintiff”) and Defendant Samsung Electronics America, Inc. (hereinafter, “Defendant”) have reached an individual settlement that will not require class certification or court approval of settlement.

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff and Defendant, by and through their attorneys of record, therefore hereby stipulate to dismissal of any and all of Plaintiff’s individual claims against Defendant, and stipulate to the proposed order attached hereto. This dismissal is without prejudice to any claims of the putative class members other than Plaintiff.

STIPULATED TO, AND DATED AND RESPECTFULLY SUBMITTED this 10th day of July, 2017.

By: /s/ Michael F. Ram  
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*Attorneys for Plaintiff*

By: /s/ Randall W. Edwards  
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*Attorneys for Defendant*

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**II. LOCAL RULE 5-1(I)(3) STATEMENT**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from counsel for all parties, and that I will maintain records to support this concurrence by all counsel subject to this stipulation as required under the local rules.

Dated: July 10, 2017

By: /s/ Michael F. Ram  
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*Attorneys for Plaintiff*

1                   **III. ~~PROPOSED~~ ORDER PURSUANT TO STIPULATION**

2                   This matter came before the above-entitled Court on the parties' stipulation for dismissal  
3 with prejudice. After reviewing the files and records herein, and the Court having been fully  
4 advised, it is hereby:

5                   ORDERED that Plaintiff's individual claims against Defendant are DISMISSED WITH  
6 PREJUDICE with each party to bear their own attorneys' fees, costs and expenses except as may  
7 be otherwise agreed to by the parties. This dismissal is without prejudice to any putative class  
8 claims.

9                   IT IS SO ORDERED this 11<sup>th</sup> day of July, 2017

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14                   The Hon. Laurel Beeler  
15                   UNITED STATES DISTRICT JUDGE  
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